

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

FUNDAMENTAL INNOVATION SYSTEMS  
INTERNATIONAL LLC

Plaintiff,

vs.

SAMSUNG ELECTRONICS CO. LTD. ET AL

Defendants

**Civil Action No. 2:17-cv-145-JRG**

**JOINT MOTION FOR ENTRY OF PROPOSED PROTECTIVE ORDER  
WITH DISPUTED PROVISIONS FOR RESOLUTION BY THE COURT**

Plaintiff Fundamental Innovation Systems International LLC (“Plaintiff”) and Defendants Samsung Electronics Company, Ltd., and Samsung Electronics America, Inc. (“Defendants”) jointly submit this motion seeking entry of a Protective Order. The parties have conferred regarding the Court's default Protective Order, and have been able to agree on a number of a proposed changes and additions, but have been unable to agree on others. The Proposed Protective Order with Disputed Provisions is attached hereto as a proposed order. Plaintiff's position on the disputed provisions is set forth in Exhibit A attached hereto, along with supporting exhibits A-1 through A-15. Samsung's position on the disputed provisions is set forth in Exhibit B attached hereto, along with supporting exhibits B-1 through B-3. The parties respectfully request that the Court enter a Protective Order after resolving the parties' disagreement over the disputed provisions.

Dated: July 7, 2017

Respectfully submitted,

By: /s/ Thomas C. Werner

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*/s/ Melissa Richards Smith*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 7th day of July, 2017.

/s/ *Melissa Richards Smith*

Melissa Richards Smith